## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

UNITED THERAPEUTICS CORPORATION,	)
CORPORATION,	)
Plaintiff,	)
v.	) C.A. No. 23-975-RGA-SRI
LIQUIDIA TECHNOLOGIES, INC.,	)
Defendant.	)

# LIQUIDIA'S MOTION FOR TELECONFERENCE TO RESOLVE DISCOVERY DISPUTES

Defendant Liquidia Technologies, Inc. respectfully moves this Court to schedule a teleconference to address the following discovery matters:

- Liquidia's motion to compel UTC to produce documents responsive to RFP Nos. 20, 21, 26, 27, 28, 40, 43, and 44 regarding communications between UTC and prior art authors and internal documents from UTC regarding the use of treprostinil to treat PH-ILD;
- UTC's improper Highly Confidential designation of the deposition transcripts of thirdparty subpoenaed witnesses Drs. Rajan Saggar and Maria Faria-Urbina and UTC's improper Highly Confidential designation of documents produced by Dr. Rajan Saggar pursuant to Liquidia's subpoena.

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in a verbal meet-and-confer by telephone on October 1 and 23, 2024.

#### • Plaintiff:

Delaware Counsel: Michael Flynn (Morris, Nichols, Arsht & Tunnell LLP) Lead Counsel: Art Dykhuis (McDermott, Will & Emery LLP)

#### Defendant:

Delaware Counsel: Karen Keller, Nathan Hoeschen (Shaw Keller LLP) Lead Counsel: Sanya Sukduang (Cooley LLP)

The parties are available for a teleconference at the Court's earliest convenience and on the following dates:

- November 19, 2024
- November 21, 2024 (2:00 pm or later)
- November 22, 2024

OF COUNSEL:
Sanya Sukduang
Michael Klisch
Phillip E. Morton
Jonathan Davies
Adam Pivovar
John A. Habibi
Rachel Preston
Rosalynd D. Upton
COOLEY LLP
1299 Pennsylvania Avenue, NW, Suite 700
Washington, DC 20004-2400
(202) 842-7800

Lauren Strosnick Kyung Taeck Minn COOLEY LLP 3175 Hanover Street Palo Alto, CA 94304-1130 (650) 843-5000

Thomas Touchie COOLEY LLP 55 Hudson Yards New York, NY 10001-2157 (212) 479-6000

Dated: November 8, 2024

### /s/ Nathan R. Hoeschen

Karen E. Keller (No. 4489)
Nathan R. Hoeschen (No. 6232)
SHAW KELLER LLP
I.M. Pei Building
1105 North Market Street, 12th Floor
Wilmington, DE 19801
(302) 298-0700
kkeller@shawkeller.com
nhoeschen@shawkeller.com
Attorneys for Defendant